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Hearing Date: April 8, 2015 at 10:00 a.m. (Eastern)

Response Deadline: March 30, 2015 at 4:00 p.m. (Eastern)

- and -

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Attorneys for:

*Highland CDO Opportunity Master Fund, L.P.,
Highland Credit Opportunities CDO, L.P.,
Highland Credit Strategies Fund,
Highland Credit Strategies Master Fund, L.P., and
Highland Credit Offshore Partners, L.P.*

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC.,
et al.,

Debtors.

CHAPTER 11

CASE NO. 08-13555 (SCC)

(Jointly Administered)

**JOINDER OF HIGHLAND ENTITIES TO OBJECTION OF NATIONAL
AUSTRALIA BANK LIMITED TO DEBTORS' MOTION TO ALLOW
DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES PURSUANT TO
SECTION 107(a) OF THE BANKRUPTCY CODE**

Highland CDO Opportunities Master Fund, L.P., Highland Credit Opportunities CDO, L.P., Highland Credit Strategies Fund, Highland Credit Strategies Master Fund, L.P., and Highland Credit Offshore Partners, L.P., (collectively, the "Highland Entities") by and through their counsel, Cole Schotz, P.C., hereby join in and adopt the arguments presented in the objection (the "Objection") to the *Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* (the "Motion")

[D.I. 48939], filed by National Australia Bank Limited (“NAB”) [Docket No. 49029].¹ In support of this joinder and the Highland Entities’ objection, the Highland Entities state as follows:

BACKGROUND AND JOINDER

The Highland Entities, similar to NAB, relied on the Bar Date Order, in agreeing to submit their claim-specific derivative information, which was provided to the Debtors as part of the claims administration and allowance process.

For all the reasons set forth in the Objection by NAB, the Highland Entities also object to the relief requested in the Motion and respectfully assert that the Debtors should not now be granted a blanket release and permitted to use the information submitted in accordance with this Court’s Bar Date Order for any purpose.

The Highland Entities object to the disclosure of the information that each submitted pursuant to the protection of this Court’s Bar Date Order, in particular to the disclosure of such information to third-parties. Had the Highland Entities known that any of the information that they each submitted as part of the claims allowance process could have been released for public consumption, the information would have been tailored differently or certain information would not have been provided.

To the extent the Court does not deny the Motion, the Highland Entities should be given the opportunity, at a minimum, in advance of any disclosure by the Debtors, to know what will specifically be disclosed and to whom and the Highland Entities should be provided an opportunity to redact any information, by agreement with the Debtors, or be afforded a further opportunity to address such redaction with the Court.

¹ Capitalized terms not otherwise defined herein shall be ascribed the same meaning as in the Motion or the Objection.

WHEREFORE, the Highland Entities join in and adopt the arguments presented in the Objection filed by NAB and respectfully request that the Court accordingly deny the Motion.

Dated: March 30, 2015

Respectfully submitted,

COLE SCHOTZ P.C.

By: /s/ Michael D. Warner
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